

VIRGINIA:

IN THE CIRCUIT COURT OF LOUDOUN COUNTY

Mohammad Asif Ghaznavi

Aysha Chishty

Case# 20-1474

Forest E. White

Demand For Jury Trial

Law Firm Forest E.White P.C

Reserve The Right To Amend

Plaintiff/Counter-Defendant

Kimberly Vu

Duc Nguyen

Global Realty Management Inc.

GRM Group Inc.

Defendants/Counter-Plaintiffs

2020 MAR 24 PM 3:02
CIRCUIT COURT
CLERKS OFFICE
LOUDOUN COUNTY, VA
TESTE: _____ D.C.

FILED

DEFENDANTS/COUNTER PLAINTIFF'S COUNTERCLAIMS OF \$850,000 FOR FRAUDULENT MISRESPRESENTATION, FRAUDULENT TRANSFER DEED OF TRUST, TRESPASS WRONGFUL EVICTION, SLANDER OF TITLE, AND INTENTIONAL INFLECTING EMOTIONAL DISTRESS- THE CLAIM IS ALSO AGAINST THE PLAINTIFF/COUNTER-DEFENDANT'S ASSETS

COMES NOW Defendants Kimberly Vu, Global Realty Management Inc, and bring these Counterclaims against Plaintiff Mohammad Asif Ghaznavi, Aysha Chishty, Forest E.White & Law Firm Forest E.White P.C. Specifically, Defendants state counterclaims against Plaintiff for the Wrongful Action of Fraudulent Misrepresentation, Fraudulent Transfer Deed of Trust, Trespassing, Harrassing, Wrongful Eviction, Intentionally inflicting distress Financially and Emotionally and for their Violation of Federal Law FDCPA, TILA, RESPA. The homeowner filed a "wrongful foreclosure' lawsuit against the foreclosing attorney, the attorney's law firm and the lender. This lawsuit is filed in Federal Court along with a "Restraining order-Injunction' to block the Wrongful foreclosure and eviction until wrongful foreclosure lawsuit can be determined in Federal Court.

PLAIN STATEMENT OF FACTS THAT MAKE UP THE CLAIM:

1. **The homeowner filed a lawsuit in Federal Court and Created a Title dispute.** The eviction court did not have jurisdiction to make a determination in a property dispute. The right of immediate possession can only be determined after the property dispute has been settled.
 - a. **(Case#1:20cv317- Federal Court Eastern Alexandria)**
 - b. **(Case#1:20-cv-00781 Federal Court District Of Columbia)**
 - c. **(Case#1:20-cv-00777 Federal Court District Of Columbia)**
2. **The lawsuit was filed in Federal Court along with a “Restraining order-injunction’ to block the foreclosure and eviction until the wrongful foreclosure lawsuit can be determine in Federal court.**
3. **The third party buyer in this civil action is not entitled to a level of protection superior to that of an aggrieved borrower because the buyer did not follow the rules of sale.**
4. **The third party buyer was provided constructive notice that there is a title dispute with the property and the third party buyer and the attorney ignored the title dispute and the fact the wrongful foreclosure lawsuit was pending in Federal Court and continued with the wrongful eviction.**
5. **If all matters between the parties cannot be adjudicated in the justice court in which the forcible entry and detainer proceedings are pending due to the justice court’s limited subject matter jurisdiction, either party may maintain an action in a court of competent jurisdiction for proper relief.**

INTRODUCTION

6. **Plaintiff/Counter-Defendant, Mohammad Asif Ghaznavi, Aysha Chishty, Forest E.White & Law Firm Forest E. White conducted a **Fraudulent Transfer of Deed of Trust, Trespassing, Harassing us Legal Homeowner/Tenants , Wrongful Eviction, Violated Federal Law of FDCPA, TILA, RESPA.****
7. **Mr.Mohammad Asif Ghaznavi and Aysha Chishty have no Legal Ownership, No Standing and authorization of the property 42414 Chamois Ct. Sterling, VA 20166 to file an “Unlawful Retainer’ complaint to obtain the Possession of the property.**
8. **There’s a pending Title Dispute and Property Dispute on property in Federal Court of Virginia Eastern District of Alexandria (case#1:20cv317) and Federal Court of Washington, District of Columbia (Case#1:20-cv-00777). This lawsuit is file in Federal Court along with a “Restraining order-injunction’ to restrain/block the **Wrongful foreclosure and eviction until the wrongful foreclosure lawsuit can be determine in Federal Court.****

9. **Fraudulent Misrepresentation- With No Legal ownership and/or "Standing", Loan Servicing Company** Wilmington Savings Fund Society & Samuel I. White make an "unauthorized, unannounced, personal sale transaction and a Fraud Deed of Trust Transfer" to Ghaznavi and Chishty on February, 13, 2020 at an **Inadequate Low Sale price that "Shocks the Conscience" \$609,000.** (Market value of property ranges from \$820,000-\$880,000).
10. **The third party buyer/investor Mohammad Asif Ghaznavi and Aysha Chishty in this civil action is not entitled to a level of protection superior to that of an aggrieved borrower because the buyer/investor did not follow the rules of sale.**
11. Defendants/Counter-Plaintiffs Kimberly Vu & Global Realty Management Inc, homeowners, disputes the title and ownership of the real property in question (the "Home"), which is the subject of this action, in that the **Loan Servicing Company** Wilmington Savings Fund Society represented by Samuel I. White P.C Lawfirm **Misrepresent themselves as Lender**, alleged to have ownership of Plaintiff's mortgage note and/or Deed of Trust, have **unlawfully sold, assigned and/or transferred their "False" ownership and security interest in a Promisory Note and Deed of Trust** related to the Property that they do not have lawful ownership or a security interest in the Plaintiff's Home which is described in detail herein, property address 42414 Chamois Ct, Sterling VA 20166. **Without Legal ownership and/or "Standing", Loan Servicing Company** Wilmington Savings Fund Society & Samuel I. White make an "unauthorized, unannounced, personal sale transaction and a Fraud Deed of Trust Transfer" to Ghaznavi and Chishty on February, 13, 2020 at an **Inadequate Low Sale price that "Shocks the Conscience" \$609,000.** (Market value of property ranges from \$820,000-\$880,000).
12. The third party buyer was provided constructive notice that there is a Title Dispute with the property and the **third party buyer and their attorney ignored the title dispute and the fact the wrongful foreclosure lawsuit was pending in Federal Court** and continued with the **wrongful Fraudulent Transfer of Deed of Trust and Continuation Act of Wrongful Eviction through their ongoing Harrasing homeowner/tenants and filing of Unlawful Retainer Complaint** at local court in which they have No Standing and legal Authorization to conduct such act. **This lawsuit is file in Federal Court along with a "Restraining order-injunction" to block the Wrongful foreclosure and eviction until the wrongful foreclosure lawsuit can be determine in Federal Court.**

JURISDICTION

13. **A notice of Filing A Notice of Removal of this civil action** (case#20-1474) from State Court to Federal Court (**Federal Filing # 1:20CV318**). There's a current pending Federal case of Title/Property Disputes on subject matter, property address 42414 Chamois Ct, Sterling VA 20166. In which the Plaintiff-Counter Defendants have no Legal Ownership or Standing to File their "Unlawful Retainer" case to obtain the right of his/her possession at state court of Loudoun County Circuit Court.
14. **The Federal District court shall have original jurisdictions of all civil actions where the matter in controversy involve Federal Questions, Diversify among the parties and the sum or value is more than \$75,000.**
15. The Federal District Court of Alexandria and District of Columbia have shall have original jurisdiction of subject matter jurisdiction over the instant action because there is **Federal Question of Violation of FDCPA, TILA and RESPA Law**. And this complaint seeks monetary damages of **\$850,000** which is in excess of \$75,000.
16. **More Details of Pending Federal Lawsuits can be review:**
 - d. **(Case#1:20cv317- Federal Court Eastern Alexandria)**
 - e. **(Case#1:20-cv-00781 Federal Court District Of Columbia)**
 - f. **(Case#1:20-cv-00777 Federal Court District Of Columbia)**
17. **The homeowner filed a lawsuit in Federal Court and Created a title dispute where by Eviction Court no longer had jurisdiction.** If all matters between the parties cannot be adjudicated in the justice court in which the forcible entry and detainer proceedings are pending due to the justice court's limited subject matter jurisdiction, either party may maintain an action in a court of competent jurisdiction for proper relief
18. It is also inappropriate to raise issues of title, since justice courts do not have authority over suits **"for trial of title to land..."**

PARTIES

19. **Kimberly Vu**, is a resident of District of Columbia, Washington. With her principle address located at 1000 Potomac St. N.W, Washington DC, 20007.
20. **Global Realty Management Inc.** is a corporation of Commonwealth of Virginia
21. **Mohammad Asif Ghaznavi and Aysha Chishty** are residents of Commonwealth of Virginia, with their principle residence located at 45973 Iron Oak Terrace, Sterling VA 20166.
22. **Forrest E. White** is a resident of Commonwealth of Virginia with address at 4 Loudoun Street S.E, Leesburg, Virginia 20175.

23. Law Firm Forrest E.White P.C is a corporation of Commonwealth of Virginia with address at 4 Loudoun Street, S.E. Leesburg, Virginia 20175.

POSSESSION VS. TITLE ISSUES

24. There is a distinction between disputes concerning possession and disputes concerning title- although both issues may of course arise within the same case. Generally, justice courts have original jurisdiction over possession and district courts have original jurisdiction over title.
25. Procedure Rule 510.3 (e) also provides that the justice court must adjudicate the right to actual possession and not title.
26. Justice courts do not have jurisdiction to determine or adjudicate title to land, and neither does a county court exercising appellate jurisdiction in a forcible detainer action.
27. If, however, the question of title is so integrally link to the issue of possession that the right to possession cannot be determined without first determining title, then the justice courts and, on appeal, the county courts, lack jurisdiction over the matter. **Cases with title and possession issues that are “intergrally linked” and have issue that raises Federal Questions belong in Federal Court.**

FACTS OF THE DISPUTES

28. Defendants/Counter-Plaintiffs, homeowner, disputes the title and ownership of the real property in question (the “Home’), which is the subject of this action, in that the **Loan Servicing Company** Wilmington Savings Fund Society respresented by Samuel I. White P.C Lawfirm Misrepresent themselves as Lender, alleged to have ownership of Plaintiff’s mortgage note and/or Deed of Trust, have **unlawfully sold, assigned and/or transferred their “False’ ownership and security interest in a Promisory Note and Deed of Trust** related to the Property that they do not have lawful ownership or a security interest in the Plaintiff’s Home which is described in detail herein, property address 42414 Chamois Ct, Sterling VA 20166. **Without Legal ownership and/or “Standing”, Loan Servicing Company Wilmington Savings Fund Society & Samuel I. White make an “unauthorized, unannounced, personal sale transaction and a Fraud Deed of Trust Transfer”** to Ghaznavi and Chishty on February, 13, 2020 at an **Inadequate Low Sale price that “Shocks the Conscience’ \$609,000.** (Market value of property ranges from \$820,000-\$880,000).
29. Plaintiff/Counter-Defendant Mohammad Asif Ghaznavi, Aysha Chishty, Forrest E. White and Forrest E.White P.C Law Firm conducted an Fraud Deed Of Trust Transfer,

Trespassing Wrongful Eviction Act, Violated Federal, Statute law of FDCPA, TILA & RESPA.

30. **Motives and Financial Gain** from each Plaintiff/Counter-Defendant's party. For this Illegal Sale and Fraud Deed Transfer Transaction, all parties of defendants have each receive Significant Financial benefits and/or payout over the Tremendous Financial Lost and Emotional Distress of the Plaintiff Homeowner and Co-Homeowners as specify below:
- a. Loan Servicing Company who mis-represent themselves as lender get Mortgage Insurance Note Pay up in multiple amount of property value in Millions of Dollars.
 - b. Respresent Law Firm of Samuel I. White and Forrest E. White make their commission in sale transactions and New Title Insurance sale.
 - c. Plaintiff/Counter-Defendants and buyer Mohammad Asif Ghaznavi, Aysha Chishty high motive of making secret purchase deal with Servicing Law Firm at **Inadequate Low Sale price that "Shocks the Conscience" \$609,000.** (Market value of property ranges from \$820,000-\$880,000), resulting a financial gain in hundreds of thousand of dollars at the lost of Plaintiff, owner.
31. The third party buyer/investor Mohammad Asif Ghznavi and Aysha Chishty in this civil action is not entitled to a level of protection superior to that of an aggrieved borrower because the buyer/investor did not follow the rules of sale. **The third party buyer was provided constructive notice that there is a Title Dispute with the property and the third party buyer and their attorney ignored the tittle dispute and the fact the wrongful foreclosure lawsuit was pending in Federal Court and continued with the wrongful Fraudulent Transfer of Deed of Trust and Continuation Act of Wrongful Eviction through their ongoing Harrasing homeowner/tenants and filing of Unlawful Retainer Complaint** at local court in which they have No Standing and legal Authorization to conduct such act. **This lawsuit is file in Federal Court along with a "Restraining order-injunction" to block the Wrongful foreclosure and eviction until the wrongful foreclosure lawsuit can be determine in Federal Court.**

NATURE OF ACTION

32. Defendants/Counter-Plaintiffs homeowner Kimberly Vu & Global Realty Management brings **'Causes of Action'** against all defendants for **Fraud, intentional infliction of emotional distress, rescission, declaratory belief based, and violations of FDCPA, T.I.L.A and R.E.S.P.A.** This action arises from Plaintiff/Counter-Defendants Ghaznavi's, Chishty and White's continuation their Intentional and Fraudulent act of Slander&Libel Title, Fraudulent Transfer of Deed Of Trust, Trespass & Harrasing Wrongful Eviction.
33. Even with giving multiple advance notice of an **LIS PENDENS NOTICE** filed in **September/2019 and Nov/2019** with Deed Record Department of Loudoun County

Circuit Court Notifying All Parties of an Pending Lawsuit of Title Dispute on Property 42414 Chamois Ct, Sterling VA 20166, (prior to unauthorized auction Nov/18/2019 and/or their Fraud Deed transfer date Feb/13/2020). Plaintiff/Counter-Defendants Ghanavi & Chishty **together with their Real Estate title law firm & attorney intentionally ignored the notice and continued with their purchased of the property at an Unauthorized auction for an Inadequate Low Sale price that "Shocks the Conscience" (\$609,000) and their Fraudulent Transfer of Deed of Trust with intentional to steal the property and created Financial Loss for Homeowner/Plaintiff in amount exceeding \$850,000 (Property's Market Value). All Plaintiff/Counter-Defendant including Ghaznavi, Chishty, White and their Lawfirm used their scare tactics act of continuously Trespassing, Harrassing, making verbal Threats to homeowners & tenants. This inflict enormous amount of Emotional Pain for Homeowner/Plaintiff on top of the Financial Loss. They continued with their Illegal act of starting an Wrongful Eviction process by filling an "Unlawful Retainer" lawsuit at local court which they have "No Standing as Legal Owner of Property and/or Authority to file Such Claim! With intention to deceive/cover up the State's court Judge of the pending Property/Title Dispute and their Fraud conduct. With hope to obtain the Eviction order in prompt time and conduct their Wrongful Eviction act before anybody including the Property Owner, Local Judge and Higher Court have enough time to come to their realization of such Illegal act of taking a property that's worth in \$850,000 in value from the Defendants/Counter-Plaintiffs and co-owners. I am seeking an award of punitive damages to deter Plaintiff/Counter-Defendant Mohammad Asif Ghaznavi, Aysha Chishty, Forest E.White & Law Firm Forest E.White P.C from undertaking such Fraudulent and predatory conduct in the future.**

34. Plaintiff/Counter-Defendants Mohammad Asif Ghaznavi, Aysha Chishty, Forest E. White Violated the Federal FDPCA, TILA & RESPA law with their action of making private sale transaction with Loan Servicing Company & Samuel I. White as well as conducted a Fraudulent Deed Transfer on Feb/13/2020 (illegally recorded 2/14/2020). They continued with their Illegal act of Trespassing Property, Harrassing, Using Indimidation and Scare Tactic which inflicted Emotional Stress for Plaintiff, Onwer and Tenants.
35. On March 3rd, Plaintiff/Counter-Defendants conduct an Wrongful Eviction act by filing "Unlawful Retainer" complaint at local court with intention to obtain "Writ Of Possession" with No Legal Standing or Authorization of the Property.
36. The eviction court does not have jurisdiction to make a determination in a property dispute. The right to immediate pocession can only be determined after the property dispute has been settled.
37. **The third party buyer/investor in this civil action is not entitled to a level of protection superior to that of an aggrieved borrower because the buyer did not follow the rules of sale.**

- 38. The third party buyer was provided constructive notice that there is a title dispute with the property and the third party buyer and the attorney ignored the title dispute and the fact the wrongful foreclosure lawsuit was pending in Federal Court creating a title dispute**
- 39. The homeowner's filed a "wrongful foreclosure" lawsuit against the foreclosing attorney, the attorney's law firm and the lender.**
- 40. This lawsuit was filed in Federal Court along with as 'Restraining Order-Injunction' to block the foreclosure and eviction until the wrongful foreclosure lawsuit can be determine in Federal Court. The original lawsuit filed in Nov, 2019 prior to the "Unauthorized auction date" was then being dismissed "without prejudice". Which does give the plaintiff the permission to refill under the correct "Jurisdiction". The dismissal of the original lawsuit "Does Not" give the Defendants any Standing and/or legal uthority for their continuation of illegal act of Fraud Deed Transfer. **The updated, second "Wrongful Foreclosure" lawsuit as well as Restraining Order & Injunction motion is file in as of March, 2020 in the correct court and jurisdiction.****
- 41. The homeowner's filed a lawsuit in Federal Court, this created a title dispute where by Eviction Court no longer had jurisdiction. Eviction court does not have jurisdiction to hear title disputes so the third party buyer and his attorney unlawfully continued with the wrongful foreclosure and eviction process.**

ELEMENTS FOR VIOLATION OF THE FDCPA:

- a. The law firm, or the attorney, did not meet the requirement mandated in the Fair Debt Collection Practices Act (FDCPA), nessary to be a legal debt collector.
- b. The debt collector in this case is in violation of the FDCPA, they do not meet the legal requirement to be consider a debt collector and therefore have no standing before the court.
- c. The Violation of the FDCPA is a Federal question and therefore Federal Court has jurisdiction to make determination of the matter.
- d. Pro se pleadings are to be considered without regard to technicality, prose litigant's pleadings are not to be held to the same high standards of perfection as lawyer.
- e. A Third party collection agency that violates any provision of the FDCPA, ia liable to civil and criminal penalties which may include monetary compensation to the victim.

ELEMENTS FOR TRESPASS:

- a. Trespass to land is the common law tort that is committed when an individual or object of an individual intentionally or negligently enters onto another's without the legal right to do so.
- b. The elements to trespass to land is as follows: An actual interference with the right of exclusive possession (known as "entry element") and an intent or negligence in entering the land of another.

ELEMENTS FOR WRONGFUL EVICTION:

- a. Posting Eviction Notice with No Legal Standing Or Authorization of the Property
- b. Filing "Unlawful Retainer" lawsuit to obtain "Writ Of Possession" with No Legal Standing or Authorization of the Property
- c. Changing the locks on the home (if its applicable)
- d. Removing the tenant's personal belonging from home
- e. Harrassing, making threats verbal and written, intimidating, or physical harming the tenant

ELEMENTS FOR SLANDER

- a. The defendant made a false and defamatory statement concerning the plaintiff
- b. The defendant made a false and defamatory statement regard to their false ownership of property with intention to spread rumors and confuse the public, tenants and neighbors.
- c. The publisher acted at least negligently in publishing the communication.

ELEMENTS OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:

Intentional infliction of emotional distress applicable when "a plaintiff/ counter defendants intentionally inflicts severe emotional distress in a manner so unusual that the victim has no other recognized theory of redress. The elements of the tort are:

- a. The defendant acted intentionally or recklessly
- b. The defendant's conduct was extreme and outrageous
- c. The conduct caused the plaintiff emotional distress, and the emotional distress was severe.

Count One:

Fraudulent Misrepresentation

Count Two:

Wrongful Foreclosure

Count Three

Fraudulent Transfer Deed of Trust

Count Four

Slander of Title

Count Five

Trespassing & Harrasing

Count Six

Wrongful Eviction

Count Seven


Intentional Infliction Of Emotional Stress

Count Eight

Violation of Federal Law of FDCPA, TILA & RESPA

Prayer:

Defendants/Counter Plaintiff Kimberly Vu and Global Realty Management's pray the Plaintiff/Counter Defendant Mohammad Asif Ghaznavi, Aysha Chishty, Forest E.White, Law Firm Forest E. White P.C be cited to appear to answer hearing, and that this court grant the relief, including declaratory relief, and injunctive relief, requesting hearing and issue such writs and processes to preserve the Plaintiffs title and pocession of the Property to Defendants/Counter Plaintiff as requested herein, together with her/their damages and legal fees of \$850,000 and further prays that this court. Void/vacate Auction Sale Transaction, Revert Fraudulent Deed of Quit Transfer and permanent restraining order on property against all defendant's future violation.

 3/24/2020

Kimberly Vu, Global Realty Management Inc

PARID: 162352032000

GLOBAL REALTY MANAGEMENT INC & GRM GROUP INC & VU,
KIMBERLY,

42414 CHAMOIS CT

Owner

Name

Care Of

Mailing Address

GLOBAL REALTY MANAGEMENT INC & GRM GROUP INC & VU, KIMBERLY

42414 CHAMOIS CT

Instrument Number

STERLING VA 20166

Book

201911150071155

Page

Parcel

Primary Address

42414 CHAMOIS CT

Tax Map #

101///6///12/

State Use Class

Urban Single Family

Total Land Area (Acreage)

.24

Total Land Area (SQFT)

Election District

BLUE RIDGE

Billing District

Blue Ridge District

Billing Split Notes 1

Billing Split Notes 2

Special Ad Valorem Tax District

None

Special Project District

Living Units

1

Structure Occupancy

SINGLE FAMILY

Condominium Garage Unit or Parking Space

NO

Subdivision

WINSBURY

Affordable Dwelling Unit (Y/N)

NO: PROPERTY IS NOT ADU.

Ag District

Ag District Starting Date

Ag District End Date

Deactivation Status

Legal Description

Legal Description

WINSBURY LOT 12

201005030025175

200708200061191P

General Information

Loudoun County is providing public record information as a public service in accordance with Virginia Code Title 58.1-3122.2 (1998). The Loudoun County Commissioner of the Revenue provides annual valuations and maintenance of fair market values for equitable assessments on all types of real property.

The property information made available on this site includes ownership and deed information, legal description, sales information, assessment values and house characteristics and can be searched by Parcel ID Number, Address and Tax Map Number. The site is updated weekly. Parcels are linked to the Loudoun County GIS, with map overlays displaying boundary and environmental information such as topography, soils, flood plain and major roads.

Condominium garage units or assigned parking spaces associated with condominiums may have separate parcel identification numbers - and may be assessed separately.

Tax History / Payment


Click on the Parcel ID to view its related document

162352032000

2020 Values

Consideration: \$0.00 - Tax exempt §58.1-811(D)
Parcel ID No.: 162352032000
Prepared by:
Gary D. Weinstein, Esquire
1513 King Street
Alexandria, VA 22314
VA State Bar No. 8378

After Recording, please return to:
Apex Title and Escrow Corporation
3615 Chain Bridge Rd., # E-Fairfax, VA 22030


20181025-0062195
Loudoun County, VA Pgs: 2
10/25/2018 11:35:35 AM
Gary M. Clemens, Clerk

DEED OF GIFT

THIS DEED made this 24th day of October, 2018, by and between

Duc T. Nguyen and Kimberly Vu, Grantors

And

Global Realty Management Inc., a Virginia Corporation, Grantee

WITNESSETH: That for and in consideration of gift, the GRANTORS do hereby grant, and convey unto the GRANTEE, as in fee simple and with General Warranty and English Covenants of title, the following described land with its improvements in Loudoun County, Virginia:

Lot 12, Winsbury, Parcels A and B, as the same appears duly dedicated, platted and recorded in Instrument No. 20070820-0061190 with the record plats being recorded in Instrument No. 20070820-0061191 and re-recorded in Instrument No. 20080807-0048286, among the land records of Loudoun County, Virginia.

With improvements known as 42414 Chamois Court; Sterling, VA 20166.

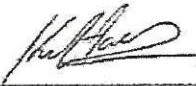
AND BEING the same property conveyed to Duc T. Nguyen and Kimberly Vu by Deed from Thuan Q. Ngo, Tam Ngo and Due T. Nguyen. Deed made February 8, 2018 and recorded on February 9, 2018 as Instrument Number 201802090007637 among the Land Records of Loudoun County, Virginia.

SUBJECT TO all covenants, restrictions, easements, and rights-of-way of record.

After Recording, please return to:
Apex Title and Escrow Corporation
3815 Chain Bridge Rd., # E, Fairfax, VA 22030

Witness the following signatures and seals:


Duc T. Nguyen

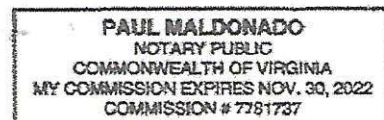

Kimberly Vu

Commonwealth of Virginia;
County of Fairfax, to-wit;

I, the undersigned Notary Public for the jurisdiction aforesaid, do hereby certify that Duc T. Nguyen and Kimberly Vu, whose names are signed to the foregoing Deed of Gift, acknowledged the same before me in my jurisdiction aforesaid, this 24 day of October, 2018.


Notary Public

My Commission Expires: 11/30/22



Grantees' Address:

42414 Chamois Court
Sterling, VA 20166

After Recording, please return to:
Apex Title and Escrow Corporation
3615 Chain Bridge Rd., # E, Fairfax, VA 22030

Consideration: \$0.00 - Tax exempt §58.1-811(D)
Parcel ID No.: 162352032000
Prepared by:
Gary D. Weinstein, Esquire
1513 King Street
Alexandria, VA 22314
VA State Bar No. 8378



20180209-0007637
Loudoun County, VA
2/9/2018 3:37:47 PM
Gary M. Clemens, Clerk

DEED OF GIFT

THIS DEED made this 8th day of February, 2018, by and between

Thuan Q. Ngo and Tam Ngo, husband and wife and Duc T. Nguyen, unmarried
erroneously referred to of record as married, Grantors

And

Duc T. Nguyen and Kimberly Vu, Grantees

WITNESSETH: That for and in consideration of gift, the GRANTORS do hereby grant, and convey unto the GRANTEES, as Joint Tenant with common law right of survivorship, in fee simple and with General Warranty and English Covenants of title, the following described land with its improvements in Loudoun County, Virginia:

Lot 12, Winsbury, Parcels A and B, as the same appears duly dedicated, platted and recorded in Instrument No. 20070820-0061190 with the record plats being recorded in Instrument No. 20070820-0061191 and re-recorded in Instrument No. 20080807-0048286, among the land records of Loudoun County, Virginia.

With improvements known as 42414 Chamois Court; Sterling, VA 20166.


AND BEING the same property conveyed to Tam Ngo and Duc T. Nguyen by Deed from Haley Cochran and Steven Thomas. Deed made November 23, 2015 and recorded on December 8, 2015 as Instrument Number 20151208-0080856 among the Land Records of Loudoun County, Virginia.


SUBJECT TO all covenants, restrictions, easements, and rights-of-way of record.

After Recording, please return to
Apex Title and Escrow Corporation
3615 Chain Bridge Rd., # E, Fairfax, VA 22030

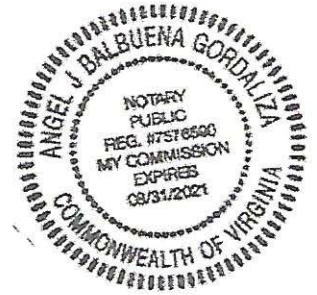
Witness the following signatures and seals:






Tam Ngo


Thuan Q. Ngo



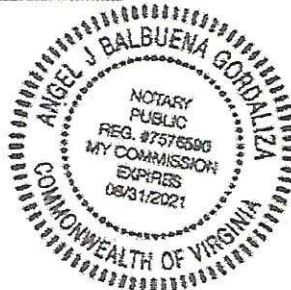
Commonwealth of Virginia;
County of Fairfax, to-wit;

I, the undersigned Notary Public for the jurisdiction aforesaid, do hereby certify that Thuan Q. Ngo and Tam Ngo, whose names are signed to the foregoing Deed of Gift, acknowledged the same before me in my jurisdiction aforesaid, this 8th day of February, 2018.



Notary Public

My Commission Expires: 08/31/2021






Duc T. Nguyen

Commonwealth of Virginia;
County of Fairfax, to-wit;

I, the undersigned Notary Public for the jurisdiction aforesaid, do hereby certify that Duc T. Nguyen, whose name is signed to the foregoing Deed of Gift, acknowledged the same before me in my jurisdiction aforesaid, this 8th day of February, 2018.



Notary Public

My Commission Expires: 08/31/2021

Grantees' Address:


42414 Chamois Court
Sterling, VA 20166

Consideration: \$690,000.00
Assessed Value: \$673,490.00
Tax Map No: 162-35-2032-000
Grantees' Address:
42414 CHAMOIS COURT
STERLING, VA 20166

Document Prepared By:
Law Office of Luisa M. White, PLLC
Luisa Miranda White, Esq.; VSB No. 72206
File No. TCVA15-265; #11-15-10 **RTS**
Underwriter: First American Title Insurance Company

This Deed, made this November 23, 2015, by and between HALEY COCHRAN,
___married, and STEVEN THOMAS, ___married, Grantors, and TAM NGO, unmarried, and DUC T
NGUYEN, ☒ married, Grantees.

- Witnesseth -


20151208-0080856
Loudoun County, VA Pgs: 2
12/08/2015 3:12 33PM Grantor Tax Pa
Gary M. Clemens, Clerk \$690.00

That for and in consideration of the sum of Ten Dollars (\$10.00), cash in hand paid, and
other good and valuable consideration, receipt of which is hereby acknowledged, the Grantors do hereby
grant, bargain, sell and convey, in fee simple, with GENERAL WARRANTY and English Covenants of
title, unto the Grantees, as joint tenants with right of survivorship, all the following-described lot or
parcel of land together with improvements thereon, situate, lying and being in the **County of Loudoun**,
Commonwealth of Virginia:


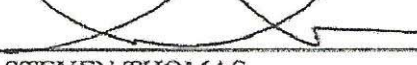
Lot 12, Winsbury, Parcels A and B, as the same appears duly dedicated, platted and
recorded in Instrument No. 20070820-0061190 with the record plats being recorded in
Instrument No. 20070820-0061191 and re-recorded in Instrument No. 20080807-
0048286, among the land records of Loudoun County, Virginia.

BEING the same property conveyed to Haley Cochran and Steven Thomas from
Richmond American Homes of Virginia, Inc., by Deed dated April 29, 2010, and
recorded on May 3, 2010, as Instrument No. 20100203-0025175.

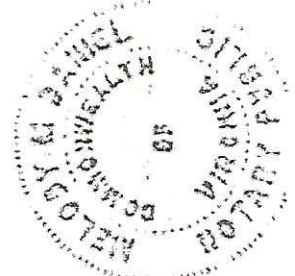
This conveyance is made expressly subject to the easements, conditions, restrictions, and
rights-of-way of record contained in the instruments forming the chain of title to the property conveyed
herein and to matters visible upon inspection.

The Grantors covenant that they are seized in fee simple of the property herein conveyed, have the right to convey the said land to the Grantees and have done no act to encumber the lands. The Grantors covenant that the Grantees shall have quiet possession of the land free from all encumbrances, except as mentioned herein, and that they, the Grantors, will execute such further assurances of the lands as may be requisite.

Witness the following signatures and seals.

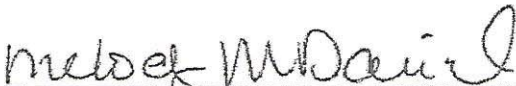
 (SEAL)
HALEY COCHRAN
 (SEAL)
STEVEN THOMAS

COMMONWEALTH OF VIRGINIA } ss
COUNTY OF Loudoun



I, undersigned, a Notary Public for the jurisdiction aforementioned, do certify that HALEY COCHRAN and STEVEN THOMAS, whose names are signed to the foregoing document, acknowledged the same before me in my jurisdiction aforesaid, this 23 day of November, 2015.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.


Notary Public

My Commission Expires: May 31, 2016
154258

After recording, please return to:
Realty Title of Tysons, Inc.
8230 Boone Blvd., Suite 330
Vienna, VA 22182

Reserved for Recording Clerk: